



Tim Day
Senior Vice President
U.S. Chamber of Commerce

1615 H Street, NW
Washington, DC 20062

April 15, 2019

VIA ELECTRONIC FILING

Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE
Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

Re: Safe and Secure Operations of Small Unmanned Aircraft Systems (Docket No.: 2018–1086; Notice No. 18–08)

To Whom It May Concern:

The U.S. Chamber of Commerce’s Technology Engagement Center (“C_TEC”) appreciates the opportunity to provide comments to the Federal Aviation Administration (“FAA”) in response to the above-referenced proceeding.¹ Safely integrating unmanned aircraft systems (“UAS”) into the National Airspace System (“NAS”) will bring significant economic benefits for consumers as well as public safety benefits. It is critical that UAS integration is conducted in a secure and safe manner so we can fully realize the benefits of UAS.

1. Comments on Critical Infrastructure Protection

Unauthorized UAS operations near critical infrastructure and other sensitive sites presents a unique risk to those sites that must addressed as additional UAS continue to be integrated in the NAS. Section 2209 of the FAA Extension, Safety, and Security Act of 2016 requires that the Department of Transportation (“DOT”) consider applications from fixed site facility owners to restrict or prohibit UAS operations around the close proximity of the facility.²

¹ 84 Fed. Reg. 3732 (Feb. 13, 2019) available at <https://www.govinfo.gov/content/pkg/FR-2019-02-13/pdf/2019-00758.pdf>

² See e.g. Section 2209, FAA Extension, Safety, and Security Act of 2016. Pub. L. 114-190. 130 Stat. 615 (2016).

Moving forward with this process is important to protect the safety and security of sensitive sites across the United States posed by unauthorized use of UAS. In addition, C_TEC believes a single federal approach to address this challenge is critical to prevent a patchwork of regulations that will cause confusion and inhibit the growth of the UAS industry. As the FAA continues to develop its approach to protecting critical infrastructure and sensitive sites, it is necessary that the FAA engage a full range of stakeholders to ensure a consistent approach and provide the necessary flexibility in order to achieve the full benefits of UAS integration.

2. Comments on Unmanned Traffic Management (“UTM”) Operations

C_TEC supports the FAA’s efforts to safely integrate UAS into the NAS to enable advanced UAS operations. The advance notice of proposed rulemaking (“ANPRM”) seeks further comments on whether the FAA should promulgate new rulemakings on the use of UTM. It is critical that the FAA continue to work with government and industry partners to make progress on existing efforts to advance UTM.

As the commercial UAS industry and innovative applications of UAS continues to grow, UTM will become an increasingly important component of the airspace management ecosystem. As a result, low-altitude airspace will become more dynamic and a UTM system will help better organize and optimize airspace potentially preventing UAS from interfering with other UAS or manned aviators. The current air traffic management system alone cannot accommodate the forecasted growth of UAS operations, and UTM will provide airspace operators the means to comply with the regulatory demands of conducting commerce in the NAS. Flexibility of the UTM system is paramount as industry continues to develop new and innovative methods for meeting these requirements.

Regulators, industry, and Congress all recognize that UTM will play a crucial role in addressing this challenge. To meet the demands of UAS on the NAS, the FAA has successfully collaborated with the private sector which allows the FAA to be more nimble and effective with its resources. The Low Altitude Authorization and Notification Capability (“LAANC”) is an early example how the FAA can leverage industry investment and best practices to keep pace with a rapidly developing technology.³ As LAANC continues to evolve from an authorization function streamlining visual line of sight operations into a system that can one day support advanced operations under a UTM framework, the FAA should continue to collaborate with the private sector to advance infrastructure and commercial models to advance the industry faster.

C_TEC believes that the private sector has an important role to play in the development and deployment of UTM as a federated system of industry infrastructure and operations service suppliers. We applaud the FAA for working with public stakeholders, such as the National Aeronautics and Space Administration (“NASA”), and private stakeholders to advance UTM. The FAA has indicated its desire to continue in this direction with the recent UAS Remote Identification Request for Information.⁴ In parallel, the FAA is partnering with NASA and the

³ See “Low Altitude Authorization and Notification Capability (LAANC) Concept of Operations” (May 12, 2017) available at https://www.faa.gov/uas/programs_partnerships/data_exchange/laanc_for_industry/media/laanc_concept_of_operations.pdf.

⁴ FAA UAS Remote Identification Request For Information, 32227-0001, Jan. 31, 2019, <https://faaco.faa.gov/index>.

private sector on the UTM Pilot Program (“UPP”).⁵ The UPP is a collaborative research program which involves many capabilities needed to support UTM in various environments. Advancements made through these projects to support a roadmap, followed by a timely action plan for implementation are necessary steps needed for future, widescale UTM deployments.

All of these efforts are ongoing and are achieving substantial progress. C_TEC strongly believes that it is essential that the FAA continues to support and remain focused on close collaboration with the private sector. Deviating from existing efforts may delay the full implementation of UTM and impede attainment of the substantial benefits resulting from UAS integration.

3. Conclusion

Protecting critical infrastructure and collaborating with the private sector on advancing UTM are both essential to safely and securely integrating UAS into the NAS and furthering the UAS industry in the United States. C_TEC thanks the FAA for its leadership and looks forward to working with the FAA on further UAS integration.

Respectfully submitted,



Tim Day
Senior Vice President
Chamber Technology Engagement Center
U.S. Chamber of Commerce

[cfm/announcement/view/32514](#).

⁵ See UTM Pilot Program Smart Sheet, https://www.faa.gov/uas/research_development/traffic_management/utm_pilot_program/media/UTM_Pilot_Program_Smart_Sheet.pdf.